

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

DISH NETWORK L.L.C.,
SLING TV L.L.C., and
NAGRASTAR LLC,

Plaintiffs,

V.

ALEJANDRO GALINDO, ANNA
GALINDO, MARTHA GALINDO,
and OSVALDO GALINDO,
individually and collectively
d/b/a NITRO TV,

Defendants.

Case No. 3:21-cv-00218

PLAINTIFFS' APPLICATION FOR CLERK'S ENTRY OF DEFAULT AGAINST
DEFENDANTS ALEJANDRO AND ANNA GALINDO

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs DISH Network L.L.C., Sling TV L.L.C., and NagraStar LLC respectfully request that the Clerk enter default against Defendants Alejandro Galindo and Anna Galindo and in support state:

1. Defendant Alejandro Galindo was properly served with a copy of Plaintiffs' complaint and summons on October 27, 2021. (Dkt. 9.) Service of process was proper under Fed. R. Civ. P. 4(e)(2)(A).

2. Defendant Anna Galindo was properly served with a copy of Plaintiffs' complaint and summons on October 27, 2021. (Dkt. 9.) Service of process was proper under Fed. R. Civ. P. 4(e)(2)(B).

3. Alejandro and Anna were required to file responsive pleadings within 21 days of being served, which was on November 17, 2021. *See* Fed. R. Civ. P. 12(a)(1)(A)(i). To date, neither Alejandro nor Anna have filed an answer or other responsive pleading, nor have they requested additional time to do so. (Declaration of Maleeah Williams ¶ 3.)

Accordingly, the Clerk should enter default against Defendants Alejandro and Anna Galindo.

Dated: November 18, 2021.

Respectfully submitted,

HAGAN NOLL & BOYLE LLC

s/ Maleeah M. Williams with permission
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Attorneys for Plaintiffs DISH Network L.L.C.,
Sling TV L.L.C., and NagraStar LLC

CERTIFICATE OF SERVICE

I certify that on November 18, 2021, Plaintiffs' Application for Clerk's Entry of Default Against Defendants Alejandro and Anna Galindo and Declaration of Maleeah Williams were served by mail on Defendants pursuant to Local Rule 5.3, at the following addresses which are Defendants' last known residences:

Alejandro Galindo and Anna Galindo
311 Scenic View
Friendswood, Texas 77546

Osvaldo Galindo
3110 Colony Drive
Dickinson, Texas 77539

Martha Galindo
4810 Alamo Drive
Galveston, Texas 77551

s/ Maleeah M. Williams with permission
Maleeah M. Williams (of counsel)

Attorney for Plaintiffs DISH Network L.L.C.,
Sling TV L.L.C., and NagraStar LLC